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Filing date: **06/07/2013**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91195609
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	MARY L KEVLIN COWAN LIEBOWITZ LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 6799 UNITED STATES mel@cll.com, trademark@cll.com, rar@cll.com, jmn@cll.com, sis@cll.com, mlk@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	06/07/2013
Attachments	Motion on Consent Minnesota Wild 060713.pdf(18234 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Application Serial Nos. 77/813,908 and 77/813,912

Filed: August 27, 2009

For Mark: MINNESOTA WILD (Stylized)

Published in the Official Gazette: January 19, 2010

MINNESOTA TWINS, LLC,

Opposer,

Opposition No. 91195609

V.

MINNESOTA WILD HOCKEY
CLUB, L.P.,

Applicant.

**MOTION ON CONSENT TO CONTINUE THE SUSPENSION OF PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the above-captioned proceeding for a period of three (3) months, until **September 7, 2013**.

Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made towards a resolution in this matter. Since the last suspension deadline, counsel for the parties have had a series of three lengthy substantive discussions in which they negotiated remaining issues by exchanging ideas and counterproposals (in between which counsel for Applicant engaged in conversations with its client relating to same), and, as a result, the parties believe they made substantial movement toward a resolution by reducing

several open issues to alternative approaches to a single open issue relating to registration. The culmination of these efforts resulted in another counterproposal on this issue being sent to Applicant's counsel by Opposer's in-house counsel on June 7, 2013 and the parties agreeing to set up a future meeting with Applicant's outside counsel, Applicant's in-house counsel and Opposer's in-house counsel in an attempt to bring closure to this remaining issue, so that this issue and the other agreed-upon terms could be memorialized in a draft agreement which, when finalized, would allow them to resolve this matter without the need to proceed with the Opposition.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six (6) months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial and other periods should be reset accordingly.

Dated: New York, New York
June 7, 2013

Respectfully submitted,
COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 7, 2013, I caused a true and complete copy of the foregoing *Motion On Consent To Continue the Suspension of the Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to applicant's attorney, Mary J. Sotis, Esq., Frankfurt Kurnit Klein & Selz PC, 488 Madison Avenue, New York, New York 10022 and Applicant's Correspondent of Record, Thomas H. Prochnow, NHL Enterprises LP, 1185 Avenue of the Americas, New York, NY 10036-2601.

Dated: New York, New York
June 7, 2013

/Seth Shaifer/
Seth Shaifer